

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

C.I.G.H., through his guardian *ad litem*
Tricia Herzfeld,

Petitioner,

v.

HEIDI STIRRUP, Acting Director,
Office of Refugee Resettlement, *et al.*,

Respondents.

NO.: 3:20-cv-00796

JUDGE CAMPBELL
MAGISTRATE JUDGE FRENSEY

**GUARDIAN AD LITEM'S MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS
A-C AND REDACT PORTIONS OF PROPOSED COMPLAINT AND AMENDED
PETITION FOR WRIT OF HABEAS CORPUS**

Tricia Herzfeld (the "Guardian"), in her capacity as Guardian *Ad Litem* for C.I.G.H., filed a Motion for Leave to Amend. Attached to the Motion for Leave to Amend, the Guardian filed an proposed Complaint and Amended Petition for Writ of *Habeas Corpus* that included pictures of C.I.G.H. The Guardian simultaneously filed, as exhibits, letters prepared by various immediate and extended members of C.I.G.H.s foster family, close friends of the Foster Parents with personal in-home observations, and other family friends, church friends, and neighbors of the Foster Parents concerning the relationship between C.I.G.H. and the Foster Parents (Exhibits A, B, and C).

The pictures depicted in the proposed amendment and exhibits A-C contain either personal identifying information concerning C.I.G.H. or his foster family by name.

The Guardian therefore moves this Court to grant her leave to file exhibits A-C under seal and leave to file a redacted version of the proposed amendment.

Dated: December 9, 2021

Respectfully submitted,

/s/ Anthony Orlandi

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through Guardian Ad Litem Tricia
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2021, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent to the following, if registered, by operation of the Court's electronic filing system. If not registered, notice was sent by First Class, United States mail, to:

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/s/ Anthony Orlandi
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